

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 AUSTIN DIVISION

MONICA RAFEEDIE, et al, §
 Plaintiffs, §
 §
 VS. § CIVIL ACTION
 § NO. 1:10-cv-743-LY
 L.L.C., INC., and W.F.K.R., §
 INC., §
 Defendants. §

ORAL DEPOSITION OF
 SOPHEA LARA TROTTA
 APRIL 26, 2011

ORAL DEPOSITION OF SOPHEA LARA TROTTA, produced as
 a witness at the instance of the Defendants, and duly
 sworn, was taken in the above-styled and numbered cause
 on the 26th of April, 2011, from 9:05 a.m. to 11:46 a.m.
 and 1:13 p.m. to 4:35 p.m., before Glenda I. Green,
 Certified Shorthand Reporter in and for the State of
 Texas, reported by machine shorthand, at the law offices
 of Mr. Brian W. Bishop, 115 Wild Basin South, Suite 106,
 Austin, Texas, pursuant to the Federal Rules of Civil
 Procedure and the provisions stated on the record or
 attached hereto.

1 A No.

2 Q Okay. All right. Now, can you just on the
3 record -- and I know the court reporter has gotten this,
4 but can you put -- can -- can you tell me your full
5 legal name?

6 A My name is Sophea Trotta -- Sophea Lara
7 Trotta.

8 Q Okay. And have you ever gone by any other
9 names?

10 A No.

11 Q And your date of birth.

12 A 1/1/67.

13 Q And I have been told that you were, if not the
14 top, probably one of the top money making entertainers
15 at Perfect 10. Is that correct?

16 A Define that.

17 Q You made more money than most, if not all, the
18 other entertainers.

19 A How would they know that?

20 Q Well, I'm asking you if you would say that.

21 A I'm -- I make fairly well just like everybody
22 else.

23 Q Okay. And what is "fairly well"?

24 A Forty to \$45,000 a year.

25 Q Okay. When -- When did you first start

1 MR. SHAFER: Go ahead.

2 MR. DEBES: I -- I told her to pull her
3 record for the three last years --

4 MR. SHAFER: Okay.

5 MR. DEBES: -- since that was --

6 MR. SHAFER: Okay.

7 MR. DEBES: -- the relevant time period
8 for the lawsuit.

9 MR. SHAFER: Right.

10 Q (BY MR. SHAFER) So it -- That's the answer?

11 A Yes, sir.

12 Q Okay. But you do have data before that.

13 A Yes, sir.

14 Q Do you have data going back all the way to the
15 time that you first began performing at Sugar's?

16 A Yes.

17 Q Okay. Because Sugar's was the first of the
18 two defending clubs that you performed at, right?

19 A Yes.

20 Q Okay. All right. Now -- And let me ask you
21 this. What is the reason that you keep the Excel
22 spreadsheet data that is contained on Exhibit 7?

23 A Taxes reason.

24 Q Okay.

25 A Auditing reasons. Just -- I want to make sure

1 I do all my taxes in the right way and deduct what needs
2 to be deducted.

3 Q Okay. So you're deducting these DJ tip-outs
4 on your tax returns that are reflected on Exhibit 7 --

5 A Yes.

6 Q -- as one of your business expenses.

7 A Yes.

8 Q Okay. Same thing with the manager tips.

9 A Yes.

10 Q Okay. Now, let's go to Exhibit 6.

11 MR. DEBES: Do you have one of those
12 lovely ones for me?

13 MR. SHAFER: Yes. There you go.

14 MR. DEBES: Thank you, sir.

15 A I feel like I'm at Enron.

16 MR. HOFFER: But they shredded --

17 Q (BY MR. SHAFER) Trust me, man, I --

18 A Now I know how they feel.

19 Q Man, I have been through document cases that
20 are a lot worse than this. This is nothing.

21 A I haven't, so --

22 Q That's okay. We'll get through it.

23 Go over -- There's -- There's what we
24 call -- We lawyers, we have stupid names for everything.
25 There are things called Bates stamps. This is -- When I

1 A Correct.

2 Q All right. All right. Let's see. Go over to
3 the next page. Go to Paragraph 7. Where it says,
4 "Other than applying for a job at the Clubs, I did not
5 do any work or invest any money to promote or advertise
6 my dancing services," do you see that?

7 A Yes.

8 Q Do you know -- Well, let me back -- let me
9 back up. You are deducting, are you not, in your tax
10 returns the tips that you paid out to the DJs and the
11 managers, correct?

12 A Yes.

13 Q Because that's why you keep those ledgers,
14 correct?

15 A Correct.

16 Q Are there any other type of business expenses
17 that you have taken as deductions with regard to you
18 performing at either Perfect 10 or Sugar's on your tax
19 returns, if --

20 A Yes.

21 Q -- you know?

22 A Yes.

23 Q All right. What are they?

24 A Costumes.

25 Q Okay.

1 A Makeup, shoes, maintaining my appearance,
2 hair, nails.

3 Q Do you have a membership at a club, you know,
4 a health club, anything like that?

5 A No.

6 Q Okay. Any cosmetic surgery you've deducted
7 over the time?

8 A Yes.

9 Q Okay. What types?

10 A Of course, my breasts.

11 Q Okay. Anything else?

12 A No.

13 Q All right. Okay. Let's go to Paragraph 8,
14 and it says, "All dancers at the" club "were paid in the
15 same manner that I was paid..." Do you see that?

16 A Uh-huh.

17 Q Okay. What does that mean?

18 A Let me think about this for a minute.

19 Q Okay.

20 MR. DEBES: Read it.

21 THE WITNESS: Okay.

22 MR. DEBES: The whole sentence.

23 Q (BY MR. SHAFER) I'm sorry. Did I kick you?
24 No, no. That's the table.

25 A Again, a yes or no, right?